

# WALNUT VALLEY WATER DISTRICT



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September 27, 2011

Delta Stewardship Council  
980 Ninth Street, Suite 1500  
Sacramento, California 95814

*Re: Fifth Draft Delta Plan*

Dear Chairman Isenberg and Members of the Council:

This letter is to express our District's concerns with the draft Delta Plan currently being developed by the Delta Stewardship Council. Though the fifth draft plan shows some improvement over previous drafts, we feel it will not meet the co-equal goals of improved water supply reliability and Delta ecosystem health in its current form. In addition, we make the following comments:

- *No clear strategy to achieve the co-equal goals.* The draft plan fails to lay out a coherent strategy to improve either water supply reliability or ecosystem health, despite a mandate to do both. No immediate-, near-, or long-term actions are identified to achieve the goals.
- *No integration of existing efforts.* Though the 2009 legislation made it a key function of the Council, the draft plan does not integrate actions across agencies with a role in the Delta. It fails to deliver vision and coordination that would distinguish the plan from CALFED and other unsuccessful efforts of the past.
- *Cloud of uncertainty created.* The draft plan is vague about what levels of water supply water agencies might expect in the future, despite a goal to improve water supply reliability. The uncertainty clouds local planning and creates economic instability.
- *Local decisions usurped.* The plan seeks to dictate local management decisions through new state regulation of rate structures, recycling targets and more. Unnecessary micromanagement undercuts planning hundreds of miles from the Delta.
- *Potentially reduced water supplies.* If the plan ultimately seeks to reduce an already diminished water supply as the cure-all for problems in the Delta, it could severely constrain the ability of some regions to provide water necessary for economic growth.
- *No comprehensive plan for ecosystem restoration.* Instead of addressing all stressors in an integrated ecosystem approach, the plan recycles failed strategies that emphasize flows without the benefit of other actions critically needed to heal the ecosystem.

We are 100% dependent on imported water supplies via the Metropolitan Water District. Accordingly, we cannot adequately plan and pursue future water resource opportunities without some certainty as to our future supplies, particularly in the Delta. As a whole, California simply cannot afford to advance a plan that creates unreliability and economic uncertainties.

We strongly encourage Council members to indentify the best options for meeting the co-equal goals. We simply must get this plan right for the sake of our water supply, our economy, and our environment.

Thank you for your time and consideration.

Sincerely,

WALNUT VALLEY WATER DISTRICT



SCARLETT KWONG  
President, Board of Directors